

REMARKS

Rejections

Applicants respectfully request consideration of the subject application as amended herein. Claims 1-41 are rejected. Claims 1, 9, 21-23, 30, 31, and 37-41 have been amended to more particularly point out what Applicants regard as the invention. The amendments to claims 1, 9, 21-23, 30, 31, and 37-41 are supported on at least paragraph 49 on page 19 of the specification as originally filed. No new matter has been added as a result of these amendments.

Rejections under 35 U.S.C. § 103(a)

Claims 1-15, 17, 20-34 and 37-41

The Examiner rejected claims 1-15, 17, 20-34 and 37-41 under 35 U.S.C. § 103(a) as being unpatentable over Crawford, U.S. Patent 5,895,784 (previously cited), in view of Etra, U.S. Patent 5,012,334 (previously cited), and further in view of Sezan et al (7,509,580).

Crawford discloses an entertainment system that generates an audiovisual program, such as a video game, from a matrix of reusable story fragment (substories). A substory which is to be performed in the future is stored in a set of slots and includes an indicator for which previous event, if any, was the cause of the planned event.

Etra discloses an image data bank of reusable image sequences (stock footage). A producer searches through the data bank for a certain image sequence for a new script, which he/she tags with a keyword. When the same producer next specifies that same

keyword, the tagged image sequence is retrieved. Etra also discloses a data index and an edit list associated with the tagged image sequences.

Sezan discloses a method of recording and presenting audio and video information to a user using description schemes. A separate description scheme is defined for each portion of the audiovisual presentation system – program(s), user, and system. A description scheme for a portion defines the functionality of that portion and the interrelationship of that portion to the other portions.

Claim 1 claims to create a second (new) description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second (new) description includes a reference to the first (existing) description to be reused.

Crawford fails to teach or suggest the second description as claimed. Crawford's indicator of a previous event cannot be properly interpreted as equivalent to the second description as claimed because Crawford's indicator references the previous event, which is the cause of the planned event, rather than a reference to the first description to be reused as claimed.

Etra fails to teach or suggest the elements of claim 1 which are missing from Crawford. Etra's tagged image sequence cannot be properly interpreted as equivalent to the second description as claimed because Etra's tag does not include a reference to the first description to be reused as claimed.

Sezan does not teach or suggest the elements of claim 1 which are missing from Crawford and Etra. Sezan's description schemes cannot be properly interpreted as equivalent to the second description as claimed because Sezan's description schemes do

not include a reference to a first description to be reused as claimed. Furthermore, Sezan does not teach or suggest a first description to be reused as claimed. Sezan discloses using preferences of a user to select audiovisual content to record and present to the user. However, Sezan's use of user preferences to select content is not equivalent to creating the second description as claimed because Sezan does not reuse the first description as claimed.

Independent claims 9, 21-23, 30, 31, and 37-41 include similar elements as amended claim 1. Therefore, the combination of Crawford, Etra, and Sezan cited by the Examiner does not teach or suggest the invention as claimed in claims 1, 9, 21-23, 30, 31, and 37-41. Claims 2-8, 10-15, 17, 20, 24-29, and 32-34 depend on claims 1, 9, 21-23, 30, and 31 and therefore are also not rendered obvious by the combination of Crawford, Etra, and Sezan. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-15, 17, 20-34 and 37-41 under 35 U.S.C. § 103(a).

Claims 16, 18-19 and 35-36

Claims 16, 18-19 and 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford in view of Etra and Sezan and in view of Official Notice that dictionary mapping, graph operations, and object-oriented inheritance graphs are well known.

Independent claims 9 and 31, as amended, on which claims 16, 18-19 and 35-36 depend, include similar elements as claim 1. As discussed above with regard to claim 1, none of Crawford, Etra, or Sezan teaches or suggests a second description which includes a reference to the first description to be reused as claimed. Even assuming *arguendo* that

the AAPA can be interpreted as disclosing dictionary mapping, graph operations, and object-oriented inheritance graphs, as alleged in the Office Action, the AAPA does not disclose the elements of claims 9 and 31, which are missing from Crawford, Etra, and Sezan.

Accordingly, Applicant respectfully submits that Applicant's invention as claimed in claims 16, 18-19 and 35-36 is not rendered obvious by Crawford, Etra, and Sezan and respectfully request the withdrawal of the rejection under 35 U.S.C. § 103(a).

SUMMARY

Claims 1-41 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Simona Freeman at (408) 720-8300.


Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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